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September 12, 2025

VIA ECF

The Honorable James R. Cho
Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Joint request for extension of time to complete mediation.
Carlo v. Abrams Fensterman, LLP, et al., Case 1:24-cv-03643-NRM-JRC

Dear Judge Cho:

The undersigned represents Plaintiff in the above-entitled action against the firm Abrams Fensterman, LLP and its partner Nicholas Corona, Jr. alleging violations of the FDCPA.

On May 28, 2025, a status conference between the parties was held. At the conference, Your Honor referred the case to the Court-annexed mediation program, and ordered the parties to select a mediator by June 11, 2025. Your Honor granted two consent requests for extension of this deadline, from June 11 to July 11 [DE 33] and from July 11 to July 18 [DE 34], on which date the parties notified the Court of their selection of mediator Ronald Kreismann [DE 35].

On August 1, 2025, the parties notified Your Honor that mediation had been scheduled for August 21, 2025 with mediator Ronald Kreismann [DE 36]. The parties jointly request an extension of Your Honor's previously-set deadline for the completion of mediation from August 29, 2025, until after a second mediation session can be scheduled and held.

On August 21, 2025, the Parties had a lengthy mediation with mediator Ronald Kreismann. While the mediation did not resolve the case, the Parties narrowed the issues. On August 28, 2025, counsel for the Parties communicated as to whether a second mediation may be productive and discussed the issues that had remained. On September 11 counsel for the Parties had a Zoom meeting with the mediator. Counsels were successful in further narrowing the issues in dispute. Subject to final client approval, which is expected within a week, counsel are looking to set a second mediation during the second or third week of October, the earliest dates available for all counsel and the mediator.

Consequently the Parties request the Court adjourn the existing deadlines to complete discovery until the Parties complete the second mediation. In the unlikely event the Parties decide not to proceed with the second mediation the Parties will promptly notify the Court. If the second mediation goes forward, as expected, the Parties will inform the Court promptly of the result. If the case does not settle the Parties will then propose discovery closing deadlines along the lines that currently existed.

Counsels thank the Court for its consideration.

Sincerely,

/s/

Ahmad Keshavarz